

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF VERMONT

UNITED STATES OF AMERICA)	
)	
v.)	Crim. No. 2:18-cr-45
)	
MARK RUSSELL (a.k.a. "Snake"),)	
Defendant.)	

GOVERNMENT'S MOTION FOR DETENTION

The United States moves for pretrial detention of the above-named defendant pursuant to 18 U.S.C. § 3142(e) and (f).

1. Eligibility for Detention.

This defendant is eligible for detention because the case involves an offense under 21 U.S.C. § 856(a), which is a Controlled Substances Act offense for which the maximum term of imprisonment is twenty years and is thus eligible for detention pursuant to 18 U.S.C. § 3142(f)(1)(C).

2. Reason For Detention.

The Court should detain the defendant because there are no conditions of release which will reasonably assure the safety of the community. The defendant has a significant criminal record and a serious drug addiction.

3. Rebuttable Presumption.

The United States invokes the rebuttable presumption against the defendant under 18 U.S.C. § 3142(e)(3).

4. Time For Detention Hearing.

The United States requests a continuance until Monday, April 30, 2018, pursuant to 18 U.S.C. § 3142(f). Among other reasons, this continuance will give the Probation Office an adequate amount of time to complete its investigation regarding whether to recommend pre-trial release.

Dated at Burlington, in the District of Vermont, April 27, 2018.

Respectfully submitted,

UNITED STATES OF AMERICA

CHRISTINA E. NOLAN
United States Attorney

By: /s/ Joseph R. Perella
JOSEPH R. PERELLA
Assistant U.S. Attorney
P.O. Box 570
Burlington, VT 05402-0570
(802) 951-6725
Joe.Perella@usdoj.gov